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January 24, 2020

**Electronic Submission**

Hon. Katharine H. Parker  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.*  
Civ. Action No.: 16-cv-09517-LAK-KHP

Dear Magistrate Parker:

I write in response to Mr. Brook's January 17, 2020 correspondence to the Court.

Plaintiffs' January 17th letter improperly addressed Eber-CT's Connecticut action against John Slocum despite the Court directing Mr. Brook to respond *only* to the Gumaer Estate's January 10, 2020 letter. Plaintiffs' counsel also made several misstatements and the Eber Defendants, by necessity, must respond to correct the Record.

As fully briefed and argued, Plaintiffs have no right at all to Eber-CT. At any rate, Lester and Wendy Eber continue to ably operate and use their best efforts to protect the value of Eber-CT, as demonstrated by the suit against Mr. Slocum for his breach of his non-compete agreement. There is absolutely no reason to believe that Plaintiffs, who have never been part of the operation of the Eber Companies, could operate Eber-CT better or more profitably than Wendy and Lester Eber.

Respectfully submitted,

Colin D. Ramsey

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cc: Brian C. Brook, Esq. (w/ enc. via e-mail and First Class Mail)  
Robert Calihan, Esq. (w/ enc. via e-mail and First Class Mail)  
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